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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUL 23 1998

REPLY TO THE ATTENTION OF:

C-14J

OVERNIGHT DELIVERY

Joseph G. Nassif  
Thompson Coburn  
One Mercantile Center  
St. Louis, MO 63101-1693

Re: U.S. EPA Cost Demand for Site G, Area 1, Sauget Superfund Site

Dear Mr. Nassif:

I am in receipt of your letter dated July 10, 1998, in which you request additional information concerning EPA's demand for Superfund response costs expended at Sauget Area 1, Site G. This letter provides a preliminary response to your inquiries.

In response to your question regarding hazardous wastes on the site, I have enclosed herein a segment of the Ecology & Environment (E & E) Sauget Area One and Two data compilation (part of a two volume set) focussing on Site G. The rest of the set is too voluminous to copy and transmit at this time. Also enclosed is the Screening Site Inspection Report, per your request. Please note that the Screening Site Inspection Report conducted by Illinois EPA is a pre-remedial phase document which by its nature includes numerous assumptions and "worst-case" scenarios when evaluating potential risks to human health and the environment. EPA's more recent sample results, as well as the Site Quality Assurance Sampling Plan, are also attached. Note that EPA in its removal action did not actually remove waste from off the site. Rather, as documented in the Action Memo, our purpose was, among others, to assess chemical hazards, stabilize and solidify exposed surface hazardous materials, extinguish burning areas remaining on and in the landfill, treat surface water runoff, consolidate contaminated soil and sediments and to place all consolidated material under a on-site cap.

As indicated in the attached reports, sampling results indicate

that many chemicals strongly associated with Monsanto operations are present in high concentrations at the site, including but not limited to: PCBs, dioxin, pentachlorophenol, 1,2 dichlorobenzen, 1,4 dichlorobenzene 4-chloroaniline, 2,4,6-trichlorophenol, 2-nitroaniline and 4-nitroaniline and chlorobenzene. Sample results found PCB and dioxin levels were above regulatory and recommended clean-up levels, respectively. EPA conducted TCLP testing for semivolatiles and metals at the site. The results of these tests are presented in the enclosed Removal Action Report.

You also request additional financial information supporting EPA's costs. We are hopeful that this package will be finalized by July 31, 1998. Once finalized this information will be forwarded to you. Also, the PRP report prepared by E & E is still in the draft and revision stage, and cannot be produced at this time.

This letter does not other convey documents which we believe Monsanto/Solutia already possess pursuant to the FOIA request. Many documents, including the ones listed below, are responsive to the inquiries contained in your letter. For example, the following documents discuss or document the presence of hazardous wastes, a release, and/or PRP liability at Site G or relevant adjacent sites:

1. ATSDR Health Report dated August 24, 1994
2. Site G Action Memorandum dated September 26, 1994
3. Site G On-Scene Coordinator POLREPS
4. EPA Removal Action Report for Site G dated August 19, 1994 (enclosed)
5. Site G Title Search
6. Sauget & Company/Industrial Salvage Articles of Incorporation
7. Paul Sauget/Village of Sauget CERCLA Section 104(e) Responses
8. C.N. Stutz Memo dated November 8, 1957 entitled "Report on Disposal of Solid Toxic Wastes, Residues and Trash from the J.F. Queeny & W. G. Krummrich Plant, Report No. 80." (enclosed)
9. CERCLA Section 103(c) Notices for Falling Springs Road Landfill
10. Sample Results/Documents Indicating Site R Landfill Contents
11. CERCLA Section 103(c) Notice for Sauget Toxic Dump
12. Documents Re: Monsanto Krummrich and Queeny Plant Products
13. in 1940s through 1950s
14. Monsanto Section 104(e) Response


15. OSC List of Items Observed at Site G (enclosed)
16. Site G Photos
17. Mobil Oil Section 104(e) Response
18. Mobil Oil CERCLA Section 103(c) Notice
19. Sampling Results for Sauget Area Two Site O

Please inform me if you need a copy of any of the above documents.

For our part, we request that Solutia voluntarily share documents with EPA. Specifically, EPA would like to receive a copy of the indemnification agreement between Solutia and Monsanto, the document authorizing Solutia to act as Monsanto's agent in this matter, and a description of the Monsanto/Solutia spin-off agreement, as well as a list of the facilities involved in the agreement. We would also request from Monsanto/Solutia information concerning other possible PRPs for Site G. It seems likely that interviews of employees who worked at Monsanto during the time period of operation of Site G would produce valuable information concerning liability at the Site. We request that you share any such information with us.

We look forward to working cooperatively with Solutia and the other PRPs in this matter. We would prefer if possible to reach an acceptable settlement in this cost recovery action. However, if this is not possible, please be aware that, unless a tolling agreement is signed by all parties herein, EPA will instruct the Department of Justice to file a civil action in the very near future.

Sincerely,



Thomas J. Martin  
Associate Regional Counsel

cc: Karen Torrent (DOJ)  
William Coonan (AUSA)  
Paul Takacs (IEPA)

bcc: Leslie Kirby  
Mike McAteer



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REPLY TO THE ATTENTION OF

C-14J

OVERNIGHT DELIVERY

Dominick De Angelis  
Mobil Oil Corp.  
EHS Superfund Response Group  
3225 Gallows Road  
Fairfax, VA 22037

Re: U.S. EPA Cost Demand for Site G, Area 1, Sauget Superfund Site

Dear Mr. De Angelis:

I am in receipt of your letter dated July 15, 1998, in which you request additional information concerning EPA's demand for Superfund response costs expended at Sauget Area 1, Site G. This letter provides an initial response to your letter.

In response to your questions regarding Mobil's liability at Site G, I have enclosed herein a segment of the Ecology and Environment Sauget Area One and Two data compilation (part of a two volume set) focussing on Site G. I have also enclosed EPA's more recent sample results, as well as the Site Quality Assurance Sampling Plan. I am also enclosing the On-Scene Coordinator's Site Polreps and a list of items he found on the site. Mobil already has a copy of the photos taken of the material found on Site G.

These enclosed documents describe the nature, characteristics, and volume of the oily sludges and tar-like wastes, along with scattered drums, found on site. The sheer volume of this material on Site G indicates that it originated from a large scale operation. As summarized in the documents, sampling indicates that a large volume of this sludge and oily material contain wastes normally associated with refinery off-specification products, sludges and/or tank bottoms. Specifically, sampling results shows that these wastes contain high concentrations of the following constituents: lead, benzene,

ethylbenzene, toluene, xylene and/or naphthalene. Additionally, it is documented that the paper, trash and other solid waste associated with Mobil and Socony Oil found at the site were found mixed together with the referenced sludge and oily waste.

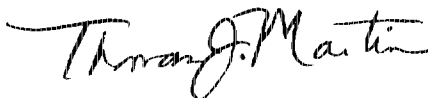
The documents and site photos also describe the beads found on site. We understand from Mobil's CERCLA Section 104(e) Response that beads of this type are associated with catalytic cracking operations formerly undertaken at the Mobil facility.

Mobil's CERCLA Section 103(c) Notification of Hazardous Waste Site states that the East St. Louis facility handled RCRA type wastes dating back to 1917. The Notice states that "leaded sludges" and one or more of the other four RCRA listed petroleum wastes were disposed of during operation of the refinery. The refinery operated until 1970. Site G, which is located less than a mile away, was operated as a landfill until at least 1966.

Finally, this letter conveys Paul Sauget's CERCLA Section 104(e) Response. Mr. Sauget was co-director of Industrial Salvage/Sauget and Company, a company which operated the Site G landfill operation. Mr. Sauget's response names Mobil as a company which disposed of wastes in Site G.

We look forward to working cooperatively with Mobil and the other PRPs in this matter. We would prefer if possible to reach an acceptable settlement in this cost recovery action. However, if this is not possible, please be aware that, unless a tolling agreement is signed by all parties herein, EPA will instruct the Department of Justice to file a civil action in the very near future.

Sincerely,



Thomas J. Martin  
Associate Regional Counsel

cc: Karen Torrent (DOJ)  
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